

TRO Exhibit 3: Threats and Denial of Accommodation

EXHIBIT 3

SWORN STATEMENT REGARDING EMAIL DENYING ACCOMMODATIONS AND THREATENING
LEGAL ACTION

I, Lester Aubrey Lee, Jr., make the following statement under penalty of perjury pursuant to 28 U.S.C. 1746: Shortly after I signed my lease at 535 Wilson Bridge Drive, a representative of my landlords property management team informed me that they received a direct email from Robert Haddad, President of the Brookside Park Condominium Association. In that email, Haddad stated unequivocally that he would not approve any requests for reasonable accommodation related to my disability. He further threatened legal action against my landlord for renting to me.

Such a declaration of intent to summarily deny accommodation without individualized assessment constitutes a direct violation of the Fair Housing Act, which requires housing providers to make reasonable accommodations for persons with disabilities unless doing so would impose an undue burden or fundamentally alter the nature of the housing program. See 42 U.S.C. 3604(f)(3)(B); see also U.S. Dept of Justice and HUD Joint Statement on Reasonable Accommodations (May 17, 2004).

Furthermore, Mr. Haddad's conduct constitutes unlawful interference under 42 U.S.C. 3617, which prohibits any person from coercing, threatening, intimidating, or interfering with another in the exercise or enjoyment of their rights under the Fair Housing Act. Mr. Haddad is not my landlord and has no legal authority to determine who may lease from my housing provider. His actions were an intentional attempt to interfere with my housing, undermine my disability protections, and exert control beyond his proper role as a condominium board president.

I respectfully submit this sworn statement as Exhibit 3 in support of my Emergency Motion for Temporary Restraining Order.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 11, 2025.

A handwritten signature in black ink, appearing to read "Lee" followed by a surname, is written over two horizontal lines.

Lester Aubrey Lee, Jr.

Plaintiff Pro Se